UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
FLINT

**In re Sheila Hodge,**

Debtor.

Case No. 15-30684-dof
Chapter 13
Hon. Daniel S. Opperman

______________________________________/

**DARRELL PARKS,**

Adv. Proc No: 15-03089-dof

Plaintiff/Counter-defendant,

**v.**

**SHEILA HODGE**

Defendant/Counter-plaintiff.

______________________________________/

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______________________________________/

**PLAINTIFF/COUNTER-DEFENDANT'S FIRST REQUEST FOR ADMISSIONS, INTERROGATORIES TO DEFENDANT/COUNTER-PLAINTIFF AND REQUEST FOR PRODUCTION OF DOCUMENTS**

Plaintiff/Counter-Defendant, DARRELL PARKS, through his attorneys, XUEREB LAW GROUP PC, by John R. Badeen, submits these first request for admissions and interrogatories to defendant/counter-plaintiff, SHEILA HODGE. The documents shall be produced for inspection and copying at the law offices of Xuereb Law Group PC, located at 7752 N. Canton Center Rd., Suite 110, Canton, Michigan 48187 on or before December 8, 2015, at 4:00 p.m. See the attached Addendum for definitions.

## REQUEST FOR ADMISSIONS

1. Admit that all of your financial records were stored in the basement at the premises located at 9271 S. Jennings Road, Grand Blanc, Michigan.

**ANSWER:**

2. Admit that you did not store any financial records in the main/upper level of the premises located at 9271 S. Jennings Road, Grand Blanc, Michigan.

**ANSWER:**

3. Admit that your personal financial records were not stored at another location.

**ANSWER:**

4. Admit that sometime in 2012 your basement at the premises located at 9271 S. Jennings Road, Grand Blanc, Michigan received flood damage.

**ANSWER:**

5. Admit that in 2012 you filed a claim for flood damage to your basement at the premises located at 9271 S. Jennings Road, Grand Blanc, Michigan received flood damage.

**ANSWER:**

## INTERROGATORIES

1. Explain in detail any denial of requests for admissions 1 through 5.

**ANSWER:**

2. Please state the cause of the flood damage that occurred in 2012 to premises located at 9271 S. Jennings Road, Grand Blanc, Michigan.

**ANSWER:**

3. Please identify the extent of the flood damage that occurred in 2012 to the premises located at 9271 S. Jennings Road, Grand Blanc, Michigan.

**ANSWER:**

4. Please provide an itemized list of what was damaged by the flood that occurred in 2012 to the premises located at 9271 S. Jennings Road, Grand Blanc, Michigan.

**ANSWER:**

5. Please describe how your financial records were stored in the basement, i.e. cardboard box, plastic container, etc.

**ANSWER:**

6. Please identify the name of any insurance company through which you filed a flood damage claim regarding the flood that occurred in 2012 to the premises located at 9271 S. Jennings Road, Grand Blanc, Michigan.

**ANSWER:**

7. Were you compensated for any of the items that were damaged by the flood by your insurance company.

**ANSWER:**

**REQUEST FOR PRODUCTION OF DOCUMENTS**

1. Produce any and all documents that support or rebut your answers to interrogatories 1 through 7, above.

Respectfully submitted,

**XUEREB LAW GROUP PC**

By: /s/John R. Badeen
John R. Badeen (P71014)
Attorneys for Plaintiff/Counter-Defendant
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(734) 455-2000

Dated: November 16, 2015

**VERIFICATION**

I DECLARE UNDER THE PENALTY OF PERJURY THAT THE ABOVE STATEMENTS ARE TRUE TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

______________________________
SHEILA A. HODGE

Dated: ____________, 2015

## ADDENDUM

A. As used herein, "document" includes any written, recorded, or graphic matter however produced or reproduced, including but not limited to, correspondence, memoranda, records, papers, pictures, reports, summaries, studies, minutes, agenda, bulletins, notices, permits, announcements, amendments, instructions, charts, manuals, schedules, price lists, drawings of diagrams, notes, analyses, telegrams, agreements, printed matter, any other writings of every nature whether inscribed by hand or by some mechanical, electronic, photographic or other means, in the possession, custody or control of your officers, directors, employees, agents, representatives, successors or successors in interest, co-workers or colleagues of the party. The word document means the original, but if the original is not in the possession, custody, or control of the persons listed above, it means a copy. All copies of documents containing any alterations, notes, comments, or other material not included in the originals or copies referred to above shall be deemed separate documents from such originals or copies.

B. The terms, "you" and "your" when used herein refer also to a corporation and each of its divisions and subsidiaries.

C. The term "identify" when used herein in connection with natural persons means to state their full name, titles and job descriptions, if applicable, and their present business and home addresses.

D. The term "identify" when used herein in connection with corporate entities means to state the corporate name and date and place of incorporation and each of its present business addresses.

E. The term "identify" when used herein in connection with documents means to describe the documents setting forth their dates, titles, authors, addresses, parties and the substance thereof, with such reasonable particularity as is sufficient for a specific demand for production. Documents to be identified shall include both documents in the possession, custody and control of the party and all other documents of which the party has knowledge.

F. The term "identify" when used herein in connection with oral statements and communications means to describe the statements and communications by (i) stating when and where they were made; (ii) identify each of the makers and recipients thereof in addition to all other persons present; (iii) indicating the medium of communication; and (iv) stating their substance.

G. When directed to any party, interrogatories and/or a requests for production of documents, depending on what the actual discovery request is are intended to and shall embrace and include in addition to the party, all agents, servants, employees, representatives, private investigators or others who are in possession of or who may have obtained information for or on behalf of said party.

H. The interrogatories, and requests for production of documents shall be considered continuing and supplemental answers shall be required immediately upon the receipt of information by the party.